FACT SHEET FOR STATE WASTE DISCHARGE PERMIT ST 6141
NC MACHINERY, INC.

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INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 6141. The Department of Ecology (Department) is proposing to issue this permit, which will allow discharge of wastewater to the Chehalis Wastewater Treatment Plant. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law [Revised Code of Washington (RCW) 90.48.080 and 90.48.160] requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit [Chapter 173-216 Washington Administrative Code (WAC)].

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix C—Response to Comments.

GENERAL INFORMATION	
Applicant:	NC Machinery Inc.
Facility Name and Address:	1178 Northwest Maryland Street Chehalis, WA 98532
Type of Facility:	Heavy Equipment and Diesel Engine Repair Shop
Facility Discharge Location:	Sewer: Latitude: 46° 40' 09" N Longitude: 122° 58' 38" W Environment: Latitude: 46° 29' 35" N Longitude: 122° 59' 02" W
Treatment Plant Receiving Discharge:	The Chehalis Wastewater Treatment Plant
Contact at Facility:	Name: Darryl E. Rootvik (425) 251-9806
Responsible Official:	Name: Darryl E. Rootvik Title: Environmental and Facilities Manager Address: NC Machinery 17035 West Valley Highway Telephone #: (425) 251-9800 FAX # (425) 251-5886

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

NC Machinery Inc. sells and repairs diesel engines and heavy machinery at this location. It is a significant industrial user. Since it has the potential to violate the POTWs heavy metals limits, it is a Significant Industrial User.

HISTORY

This facility began operations in July of 1978. It first received a permit on February 28, 1995. This permit was re-issued on February 1, 2000.

INDUSTRIAL PROCESSES

The wastewater generating process at NC Machinery is the cleaning of heavy equipment prior to maintenance. Equipment is brought in from the field to be repaired or serviced. It is washed on the washrack. Components that cannot be washed on the rack are cleaned with a steam cleaner in the building. Operations take place 6 days a week, two shifts per day. The facility stores all those chemicals required to maintain heavy equipment including fuel, oils and greases, coolant, hydraulic fluids, solvents, and cleaning compounds. Best management practices employed here are good housekeeping and constant attention to the treatment apparatus. Continuous improvement in the wastewater treatment has marked the recent history of this facility. This is a permit renewal.

Treatment Processes

Equipment Wash Rack Waste Stream 001

The wastewater treatment system for the equipment wash rack consists of a modified RGF ultrafiltration unit. The overall scheme can be seen in Attachment C.2.2. The wash water containing solids and oil are collected in a tiered two segment collection concrete basin. The first basin is approximately 3,500 gallons and the second is approximately 900 gallons. The first basin collects the primary waste from the wash rack, and the supernatant flows to the smaller basin where, via float switch control, the wastewater is lifted into the modified RGF for treatment. The treatment process operates at a flow between five to eight gallons per minute. The treatment consists of standard chemical precipitation of solids and FOG. Initially, the wastewater is injected with an aluminum compound and then passed through a 600 mesh filter bag. The pH is controlled with sodium hydroxide utilizing a model 5000A pH controller. The reaction is then finalized with an anionic polymer. The completed material is gravity settled into a 500 gallon polytank which flows into a coalescing tank. The clean water flows into a transfer basin where it is lift pumped through a model eight bag filter pressure vessel at 10 to 15 microns. The clean water is then discharged to sanitary sewer. The solids in the settling tank are transferred back to the primary sediment basin. The outside primary sediment basin is checked for solids weekly and cleaned out when solids reach a depth of eighteen to twenty-four inches. The secondary basin is checked weekly and cleaned when solids reach a depth of six inches. The inside clarifier tank is checked daily and flushed on an "as needed" basis. The overall inside treatment system is cleaned weekly. The solids removed from the primary and secondary basins outside are placed in a concrete solids vault for disposal.

Inside Wash Bay Waste Stream 002

The wastewater treatment for the inside wash bay consists of a Hyde ultra filtration (UF) system. The overall scheme can be found in Attachment C.2.3. The wash water containing solids and oil are collected in a tiered wash water collection basin. The basin collects the primary waste, then via a float switch control, the water is transferred to the primary holding tank of the UF system. A pH and biological controlling agent is injected into the sediment basin upon activation of the transfer pump. The UF system then processes the water through an oil sparging tank and spiral cotton filter media. The supernatant is transferred to the permeate process tank where it is processed through the UF unit and then discharged to the sanitary sewer. The process sludge is returned to permeate tank for further processing and proper disposal. The overall system operates between 1.0 and 0.8 gallons per minute.

PERMIT STATUS

The previous permit for this facility was issued on February 1, 2000.

An application for permit renewal was submitted to the Department on March 30, 2004, and accepted by the Department on March 25, 2004.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

A compliance inspection with sampling was conducted on May 20, 2003.

Compliance with the permit for this facility has been good. There have been no violations of the permit limits for Outfall 001 (outside washing). There were violations for lead and zinc for the first quarter of 2001 and a violation for zinc for the second quarter of 2001 at Outfall 002 (inside cleaner).

WASTEWATER CHARACTERIZATION

Wastestream #001

Parameter	**Average Concentration**
Flow	2667 gpd
Total Suspended Solids	35 mg/l
pH	7.3 SU
Oil and Grease	5.9 mg/l
Temperature	56 ^{o}F
Arsenic	0.003 mg/L
Cadmium	0.015 mg/L
Chromium	0.005 mg/L
Copper	0.017 mg/L
Cyanide	0.009 mg/L
Lead	0.010 mg/L
Nickel	0.040 mg/L
Selenium	0.001 mg/L

Parameter	Average Concentration
Zinc	0.150 mg/L
Silver	0.002 mg/L

Wastestream #002

Parameter	Average Concentration
Flow	183 gpd
Total Suspended Solids	12 mg/L
pH	7.7 SU
Oil and Grease	12.3 mg/L
Temperature	67 °F
Arsenic	0.003 mg/L
Cadmium	0.002 mg/L
Chromium	0.008 mg/L
Copper	0.005 mg/L
Cyanide	0.012 mg/L
Lead	0.056 mg/L
Nickel	0.015 mg/L
Selenium	0.001 mg/L
Zinc	0.011 mg/L
Silver	0.002 mg/L

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). The following permit limitations are necessary to satisfy the requirement for AKART:

Parameter	Quarterly Average	Daily Maximum
Total Suspended Solids, mg/l	300	300
Oil and Grease mg/l	100	100

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the Chehalis Wastewater Treatment Plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the City of Chehalis and codified in ordinance. Applicable limits for this discharge include the following:

Parameter	Quarterly Average	Daily Maximum
Oil and Grease, mg/L	100	100
Total Suspended Solids, mg/L	300	300
pH, S.U.	6 to 9	6 to 9
Temperature, ^{o} F	150	150
Arsenic, mg/L	0.23	0.23
Cadmium, mg/L	0.15	0.15
Chromium, mg/L	2.0	2.0
Copper, mg/L	0.25	0.25
Cyanide, mg/L	1.4	1.4
Lead, mg/L	0.14	0.14
Mercury, mg/L	0.0003	0.0003
Nickel, mg/L	1.8	1.8
Selenium, mg/L	0.2	0.2
Silver, mg/L	0.16	0.16
Zinc, mg/L	1.4	1.4

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED FEBRUARY 1, 2000

Parameter	Existing Permit	Proposed Permit
Flow, gpd	None	None
Oil and Grease, mg/L	100	100
Total Suspended Solids, mg/L	300	300
pH, S.U.	6 to 9	6 to 9
Temperature, ^{o} F	150	150
Arsenic, mg/L	0.23	0.23
Cadmium, mg/L	0.15	0.15
Chromium, mg/L	2.0	2.0

Parameter	Existing Permit	Proposed Permit
Copper, mg/L	0.25	0.25
Cyanide, mg/L	1.4	1.4
Lead, mg/L	0.14	0.14
Nickel, mg/L	1.8	1.8
Selenium, mg/L	0.2	0.2
Silver, mg/L	0.16	0.16
Zinc, mg/L	1.4	1.4

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S1. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S2 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.3. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment. This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the Operations and Maintenance plan so that the operation and maintenance of the treatment systems produce an effluent within the limits of this permit.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste.

This proposed permit requires, under the authority of RCW 90.48.080, that the Permittee update the solid waste plan designed to prevent solid waste from causing pollution of the waters of the state and submit it to the Department.

SPILL PLAN

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to update this plan and submit it to the Department.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually

published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for five years.

APPENDICES

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on (date) and (date) in Centralia's *The Chronicle* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on (date) in Centralia's *The Chronicle* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator
Department of Ecology
Southwest Regional Office - Water Quality
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone or by writing to the address listed above.

This permit was written by Gary Anderson.

APPENDIX B – GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the–State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an

increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

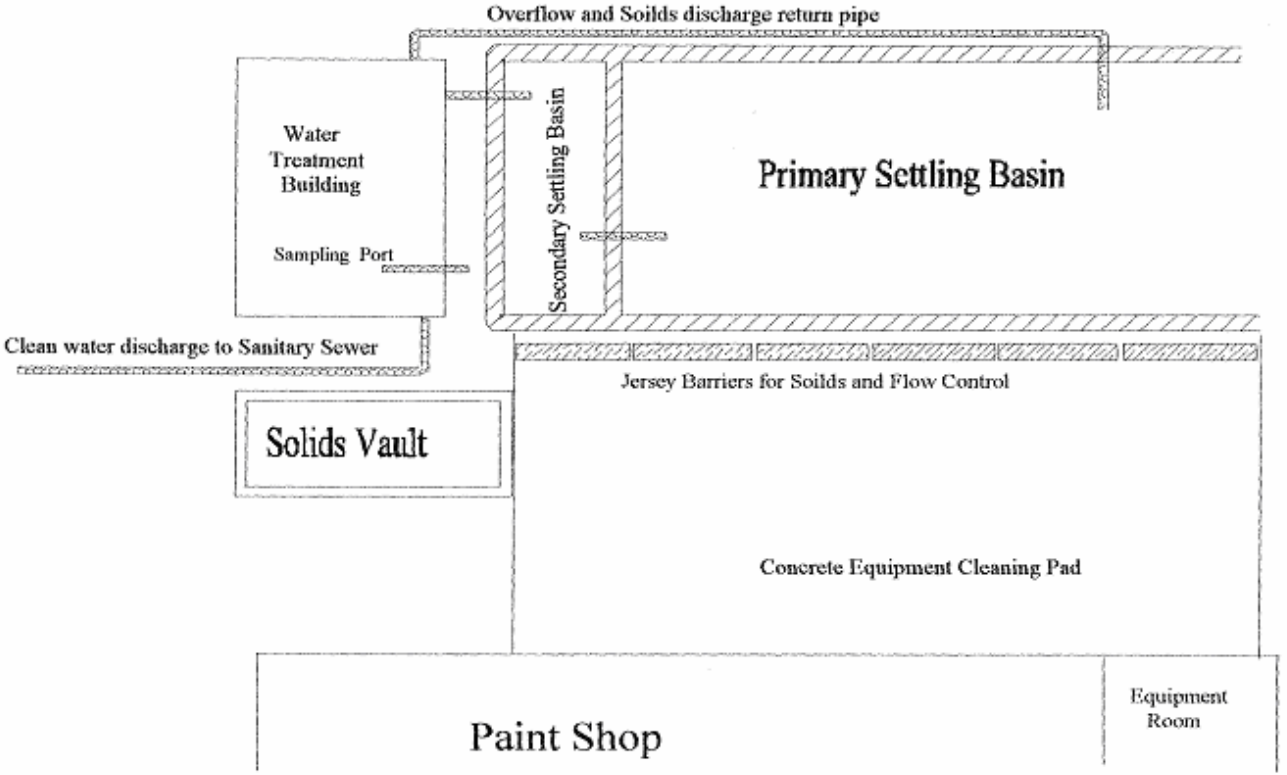
Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C– RESPONSE TO COMMENTS

ATTACHMENTS

C.2.2

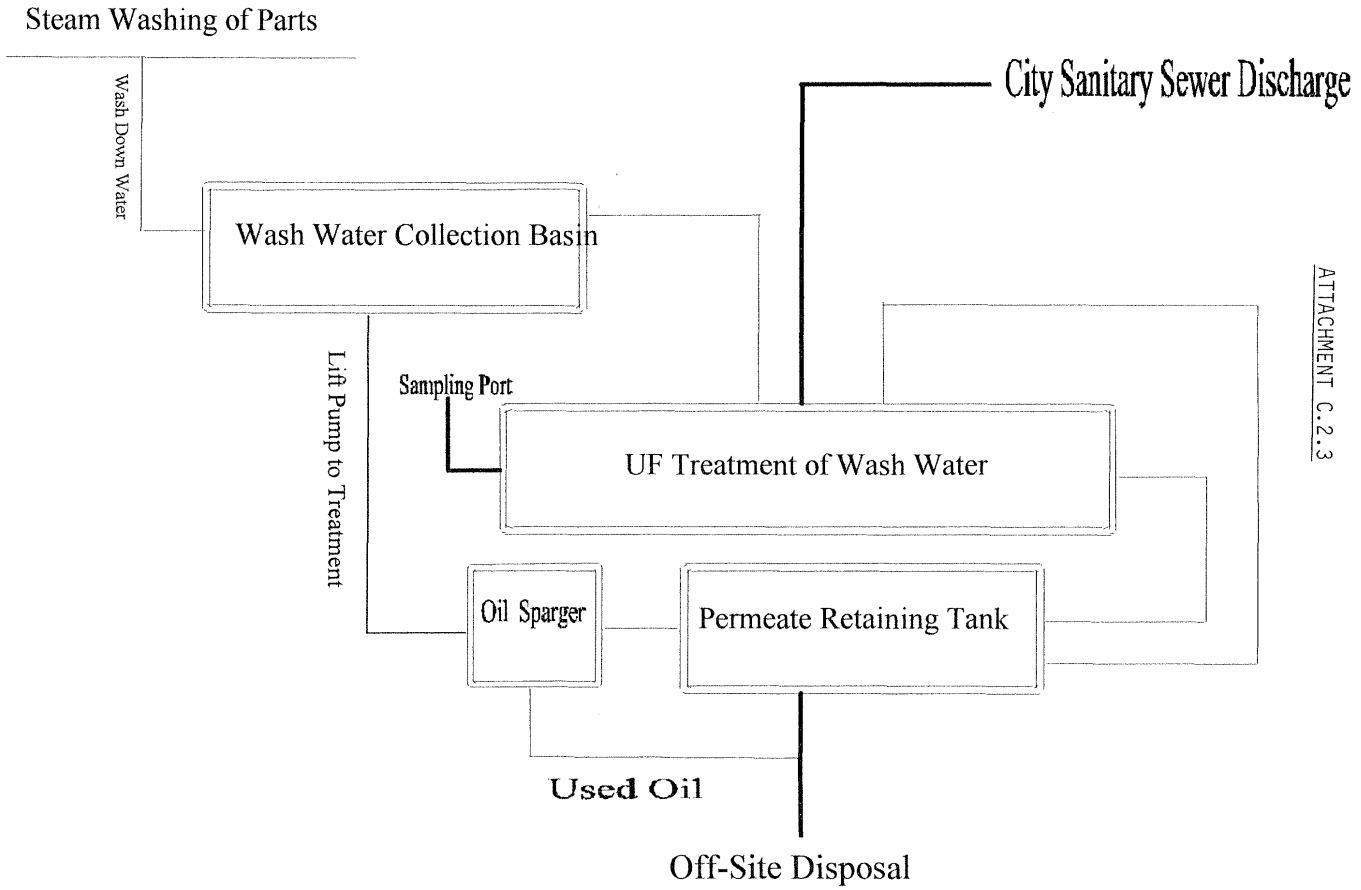
Waste Stream 001; Equipment Wash Rack

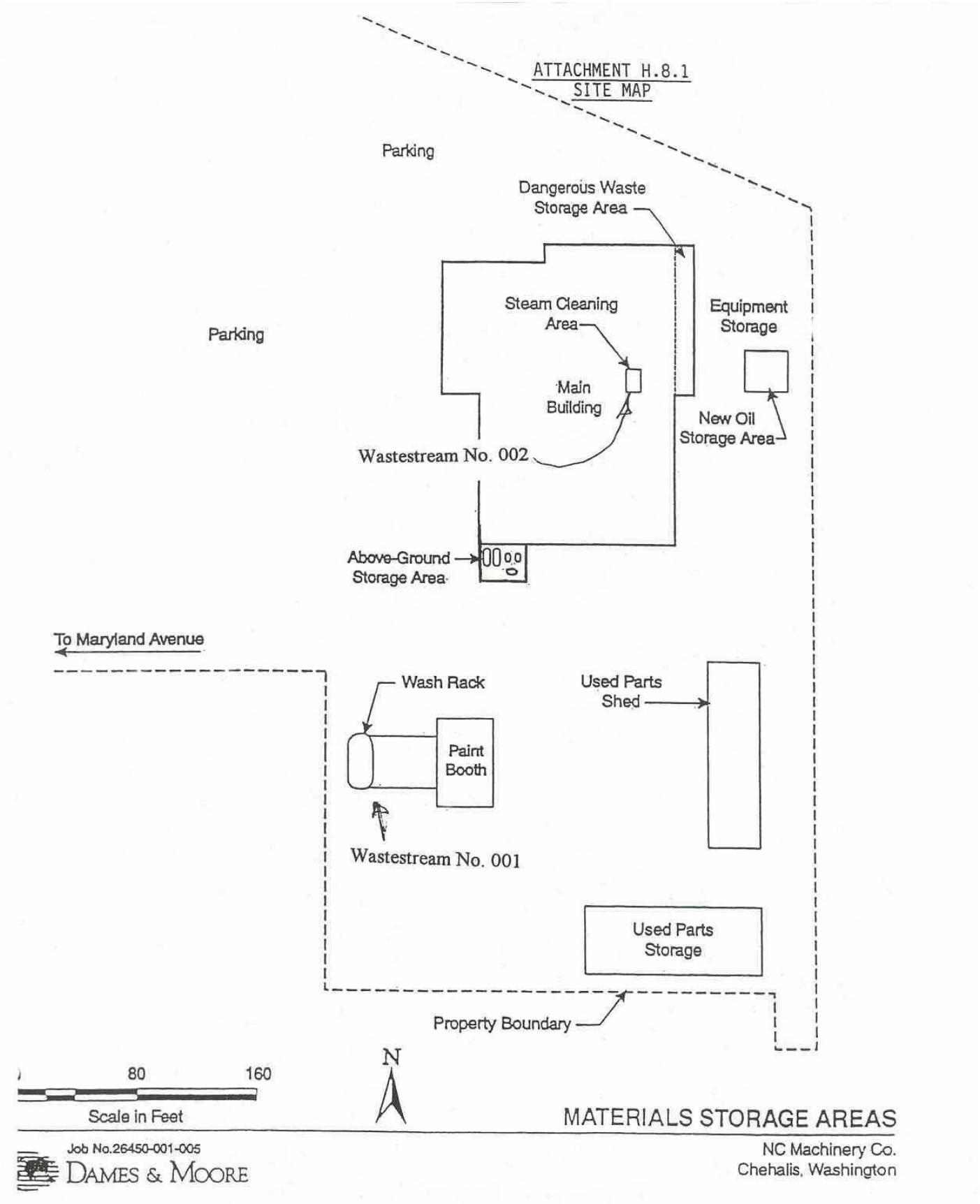


ATTACHMENT C.2.2

C.2.3

Waste Stream 002: Inside Wash Bay




ATTACHMENT H.8.1
SITE MAP
Parking
Dangerous Waste
Storage Area
Steam Cleaning
Area
Equipment
Storage
Parking
Main
Building
New Oil
Storage Area
Wastestream No. 002
Above-Ground
Storage Area
To Maryland Avenue
Wash Rack
Used Parts
Shed
Paint
Booth
Wastestream No. 001
Used Parts
Storage
Property Boundary
N
80
160
Scale in Feet
MATERIALS STORAGE AREAS
Job No.26450-001-005
DAMES & MOORE
NC Machinery Co.
Chehalis, Washington